

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JEFFREY M. GOULD**

I, Jeffrey M. Gould, hereby declare pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my personal knowledge and belief:

1. I am Senior Counsel Oppenheim + Zbrak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions. I am counsel for Plaintiffs in the above-captioned case.

2. I submit this declaration in support of Plaintiffs' Motion for Sanctions filed contemporaneously herewith.

3. True and correct copies of the following exhibits are attached to Plaintiffs' Memorandum in Support of Plaintiffs' Motion to Compel:

A. Excerpts of Transcript of Hearing on Motions, held February 15, 2019

B. Feb. 20, 2019 K. Mustico letter to J. Golinveaux

C. March 4, 2019 J. Gould email to S. Anderson

D. March 6 - 15, 2019 email chain between J. Gould and S. Anderson

E. March 20, 2019 J. Gould letter to J. Golinveaux

F. March 20 - 27, 2019 email chain between J. Gould and J. Golinveaux

G. March 28 – 29, 2019 email chain between M. Oppenheim and J. Golinveaux

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 29, 2019 in Washington, District of Columbia.

/s/ Jeffrey M. Gould